

# **EXHIBIT**

**R**

## **DEPOSITION OF ERIKA LANCE**

1.

1 IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT  
2 IN AND FOR DUVAL COUNTY, FLORIDA  
3 CIVIL DIVISION  
CASE NO.: 16-2009-CA-016234-MA

4 BAYVIEW LOAN SERVICES, LLC,

5 Plaintiff,

6 vs.

7 CYNTHIA LEE COREY  
8 a/k/a CYNTHIA L. COREY, et al,

9 Defendant.  
\_\_\_\_\_ /

10

11

12

13 DEPOSITION OF: ERIKA LANCE

14 TAKEN: Pursuant to Notice by  
Counsel for Defendant

15 DATE: June 2, 2010

16 TIME: 11:28 a.m. to 12:38 p.m.

17 LOCATION: Nationwide Title Clearing  
2100 Alt. 19 North  
18 Palm Harbor, Florida 34683

19 REPORTED BY: Brooke Wharton  
20 Notary Public  
State of Florida at Large

21

22

23

24 MAXA ENTERPRISES, INC.  
1275 Cleveland Street  
Clearwater, Florida 33755  
25 (727) 441-2404 Fax: (727) 448-0028

2

1 APPEARANCES: DANIELLE PARSONS, Esquire  
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6 Attorney for the Plaintiff  
7  
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9 126 West Adams Street  
10 Jacksonville, Florida 32202  
11 Attorney for the Defendant  
12  
13  
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3

1 THEREUPON  
2  
3 ERIKA LANCE,  
a witness herein, having been duly sworn was examined

4 and testified upon her oath as follows:

5 THE WITNESS: Yes.

6 DIRECT EXAMINATION

7 BY MS. DRYSDALE::

8 Q Ms. Lance, could you please state your full name  
9 and your business address for the record?

10 A Yes. Erika Lynn Lance, 2100 Alternate 19 North,  
11 Palm Harbor, Florida 34683.

12 Q And what business is located at that address?

13 A Nationwide Title Clearing, Incorporated.

14 Q And your title presently?

15 A The senior vice president for administration.

16 Q Okay. We introduced ourselves prior to taking  
17 the deposition, but just so you'll be hopefully a little  
18 more comfortable, we're -- I'm going to be asking you a  
19 series of questions. If you don't understand a question I  
20 ask, please ask me to rephrase it, and I'll be glad to do so  
21 because if you answer it, I'll assume that you understood  
22 it.

23 You'll need to answer out loud for the court  
24 reporter so she -- because she can't take down nods or uh-uh  
25 or uh-huh's. If you need to take a break at any time,

4

1 please let us know, and we'll be glad to do so.

2 A Okay.

3 Q Have you ever had your deposition taken before?

4 A Yes.

5 Q How many times?

6 A Three.

7 Q Were those related to your position at Nationwide  
8 Title Clearing?

9 A Yes.

10 Q When were you last deposed?

11 A About three years ago.

12 Q And what was the purpose of that deposition?

13 A It had to do with human resource cases.

14 Q All three had to do with human resource cases?

15 A Yes.

16 Q And were these -- just generally, I don't want to  
17 get into the details, but generally people who were employed  
18 by Nationwide Title Clearing who were let go?

19 A No. They had to do with workmen's compensation.

20 Q All three?

21 A Yeah.

22 Q Okay. And how long have you been an employee of  
23 Nationwide Title Clearing?

24 A About six and a half years.

25 Q Have you always held the title senior vice

5

1 president --

2 A No.

3 Q -- of administration?

4 A No.

5 Q What -- how long have you held that title?

6 A About four -- four years, four and half years.

7 Q Prior to that, what was your title?

8 A Vice president of establishment.

9 Q And prior to that?

10 A No, that was it.

11 Q Okay. When did you start working at Nationwide?

12 A January 22nd, 2004.

13 Q And when you were hired as vice president of  
14 establishment, what -- what were your duties?

15 A I was over the human resource division that also  
16 contains the mailroom.

17 Q So what would you do on a day-to-day basis?

18 A Hire, fire, benefits, employee interactions,  
19 staffing, investigations, ran the mailroom directly, which  
20 had, at that time, 35 staff in it.

21 Q Is that similar to what some -- is sometimes  
22 called human relations?

23 A It's part of it. Human resources is one  
24 department of what -- that division.

25 Q It was -- and was the division the establishment

6

1 division?

2 A Division, yeah. Our organization is laid out in  
3 divisions. You can't see the -- the organizing board behind  
4 me on tape, but it's laid out by division. So there are  
5 departments in each division. So each division usually has  
6 three or four departments in it.

7 That one had the actual, like, department of  
8 personnel, which would be what you'd consider standard human  
9 resources, the mailroom, and then it also had security and  
10 investigations and stuff like that.

11 Q Did you bring a -- a map similar to the one  
12 that's behind us with you today?



13 A No.

14 Q Okay. And you're presently -- so when -- when  
15 did you switch from vice president of establishment to  
16 senior vice president of administration?

17 A It was around May 2005.

18 Q And what -- are your day-to-day duties the same  
19 today as they were in May 2005?

20 A No. They grow and expand, of course, as an  
21 organization grows and expands.

22 Q Okay. What -- what did you -- what were you  
23 doing in May of 2005 on a day-to-day basis?

24 A Well, I'm -- I'm over the legal area also. I --  
25 at that time, I was over IT. I'm no longer over our IT

7

1 area. It mainly had the division I spoke of earlier  
2 underneath it and legal and stuff. Since then, I've also  
3 taken on client relations as a division.

4 Q When you say you're over the legal department,  
5 what -- what sort of operations is the legal department  
6 involved in?

7 A Well, any legal notifications that we get or  
8 questions. We have, of course, attorneys that handle  
9 various aspects of things, but I -- most of the legal  
10 questions that we get or like title companies having things  
11 or attorneys and stuff are things that we can handle  
12 in-house.

13 Q So are you an attorney?

14 A No, I'm not.

15 Q What type of educational training did you have

16 prior to being hired by Nationwide Title Clearing?

17 A Do you just want, like, whether I went to high  
18 school or college, that kind of thing?

19 Q High school, college.

20 A I went to high school. I got a GED actually.

21 Q And then you started working after that?

22 A I was actually working previous to that. I  
23 started working at 14.

24 Q Okay. What was your previous employer most  
25 recent to Nationwide Title Clearing?

8

1 A Consumer Sales Solutions.

2 Q What type of business is that?

3 A Telemarketing.

4 Q Did that company have anything to do with  
5 mortgages, deeds?

6 A Not at all. They were gas and energy. I ran  
7 their human resources area.

8 Q Have you had any particular -- any specific  
9 training to -- for your present position as senior vice  
10 president?

11 A Six and a half years of working at this company,  
12 yes.

13 Q Okay. Have you been required to take any title  
14 courses, real estate title courses?

15 A No. They're not required for this position.

16 Q Do any of the other employees of Nationwide Title  
17 Clearing, are they required to take any type of title, real  
18 estate title courses?



19 A No, because most real estate title courses don't  
20 actually apply to what we do here on our side.

21 Q Okay. Why -- why don't you give me a broad  
22 description then of what you do at Nationwide?

23 A We do the paperwork for mortgage companies. Most  
24 especially we do Assignments of Mortgage, Lien Releases, and  
25 document retrieval and research.

9

1 Q So that's Assignments, lien retrieval?

2 A Lien Releases.

3 Q Releases.

4 A And document retrieval and research.

5 Q Does the research not involve title research?

6 A It can involve title research, but most title  
7 courses have to do with the front end or being a realtor or  
8 doing closings. And everything we do, is after a closing --

9 Q Okay.

10 A -- paperwork-wise.

11 Q So the people that work at Nationwide Title  
12 Clearing prepare Assignments; is that correct?

13 A That is one of the functions that we do here.

14 Q Okay. And you -- they also prepare Lien  
15 Releases?

16 A Yes.

17 Q Document retrieval, I'm not sure I understand  
18 that term.

19 A Banks and mortgage companies can require certain  
20 documents be in files usually referred to as a collateral  
21 file, which usually has a -- like a certified copy of the

28

22 mortgage or the original mortgage, title policy, note,  
23 et cetera. So sometimes we can do projects where we go and  
24 retrieve copies of Assignments or mortgages or title  
25 policies so they can fill out their file.

10

1 Q Is -- is that service requested when a bank or a  
2 mortgage company or other institution finds that they have  
3 documents that are missing in their collateral file?

4 A It could be requested for any number of reasons.  
5 It's just a request they make of us to go do that.

6 Q And if the documents are not in the collateral  
7 file, where generally are you -- do you find the documents?

8 A We've used the county websites and title  
9 companies depending on the document we're looking for. If  
10 we're looking for a recorded copy of a mortgage or an  
11 Assignment modification or something like that, we go  
12 directly to the county, usually getting a plain paper copy  
13 or certified, depending on what's required.

14 If it's a title policy, we usually use the title  
15 agents or the, you know, the various levels of company just  
16 depending on what we need to or if we have to get a  
17 replacement.

18 Q What about if it's -- do you -- are you ever  
19 asked to retrieve original notes?

20 A You can't retrieve original notes. They -- if  
21 they're not in the file, there's a separate procedure that  
22 a bank has to do in order to resolve that issue.

23 Q And that's not something that National --  
24 Nationwide is involved in?

25

A No.

11

1 Q You also indicated that you -- Nationwide  
2 performs the research. What type of research?

3 A That -- that's the research I'm talking about.  
4 We can also do lien position searches and lien status  
5 searches and stuff like that.

6 Q So it -- it sounds like --

7 A -- searches.

8 Q It sounds like most of the document retrieval is  
9 obtaining documents that are of public record; is that  
10 correct?

11 A Oh, yeah. Or if -- there's some clients we work  
12 for where they have us do the collection of the documents  
13 after the closing, like from the title agent. After they  
14 get them recorded, we get the originals back from them and  
15 forward them on to their investors, not notes but original  
16 mortgages and title policies.

17 Q Who usually makes those requests?

18 A That would be our client. It depends on what  
19 service they have us sign up for -- they sign us -- they  
20 sign up with us for. Sorry.

21 Q So is that generally an originating lender  
22 requesting documents for an investor?

23 A It -- yeah. It just -- it's usually the bank  
24 that wrote the mortgage or purchased the mortgage.

25 Q Do you have any -- does Nationwide have any of

12

1 its own computer platforms for purposes of obtaining these  
2 types of documents for its document retrieval program?

3 A I don't quite understand the question.

4 Q Is it -- are there any computer programs  
5 internally involved in doing the document retrieval?

6 A Yes.

7 Q What's the name of the system?

8 A It's an oracle-based system.

9 Q Does it have a name?

10 A No.

11 Q I'm showing you a document asking you if you  
12 recognize this. It's a copy of a complaint filed in Bayview  
13 Loan Services, LLC, versus Cynthia Lee Corey.

14 Do you recognize that document?

15 A No.

16 Q Is this the first time that you've seen this  
17 document?

18 A Yes.

19 Q Okay. If you will look through the document, do  
20 you recognize any Nationwide documents attached to the  
21 complaint?

22 A No.

23 Q Okay. I'm going to show you another document,  
24 second amended notice of taking deposition ducus tecum.

25 Do you recognize that document?

13

1 A Yes.

2 Q And when was the first time you -- you saw this

3 document?

4 A I had it faxed to me a few days ago. It was -- I  
5 received it on May 28th.

6 Q And did you do anything to prepare for your  
7 deposition today?

8 A Yes.

9 Q What did you do?

10 A I retrieved the -- the -- some of the documents  
11 that are listed on the back that I was able to obtain.

12 Q Okay. Anything else?

13 A No.

14 Q All right. And we'll go through your documents  
15 in just a few minutes, but I had some other questions to  
16 ask.

17 A Okay.

18 MS. DRYSDALE: And we'll mark that as  
19 Defendant's 1.

20 (Defendant's Exhibit Number 1 was marked for  
21 identification.)

22 Q (By Ms. Drysdale) I'm showing you a copy of  
23 another document asking you if you recognize this document?

24 A Yes.

25 Q It's an Assignment of Mortgage?

14

1 A Yes.

2 Q Is this a document that was prepared by  
3 Nationwide?

4 A Yes.

5 MS. DRYSDALE: I'd like to mark that as



6 Defendant's 2.

7 (Defendant's Exhibit Number 2 was marked for  
8 identification.)

9 Q (By Ms. Drysdale) So for purposes of the clarity  
10 of record, I'll -- I'm going to refer to this as the Corey  
11 Assignment.

12 A Okay.

13 Q And just looking at the document, if you look at  
14 the very top left hand corner, it says, "When recorded,  
15 return to CitiMortgage"; is that correct?

16 A Yes.

17 Q But -- and that is C/O NTC. Is that Nationwide?

18 A Yes.

19 Q Why is the document returned to Nationwide?

20 A One of the service -- the service that we did for  
21 CitiMortgage had to do with the recording and the tracking  
22 of Assignments. So we sent it to record at the county, and  
23 then we have that so that it gets returned to us so we could  
24 mark that it came back recorded image the document.

25 Q And when you say image it, you place it in -- in

15

1 a computer program?

2 A I do. In this particular case, this is an  
3 electronically recorded Assignment which means that it was  
4 sent via electronic recording and returned to us that way.

5 Q Is that inputted -- after it's recorded, is that  
6 inputted into the oracle-based system that you referred to  
7 earlier? You said you were imaging the documents?

8 A Yeah. I do image the documents. To answer your



9 question, we have an image repository where we keep track of  
10 the documents being imaged.

11 Q Uh-huh.

12 A It's -- I don't understand the question about the  
13 input. Do you mean just do we save a copy of the recorded  
14 image?

15 Q Correct.

16 A Yes.

17 Q And is that in the image repository?

18 A Uh-huh.

19 Q Is there a name for that system?

20 A No.

21 Q You just call it the image repository?

22 A It's just where we keep our images. It's image  
23 storing.

24 Q What is -- what type of system is that?

25 A It's a SAN.

16

1 Q Is that S-A?

2 A -N.

3 Q -N.

4 A And that is the extent of what I know about it.

5 It is called a SAN. It's a type of machine that keeps large  
6 quantities of images so. . .

7 Q Do you know what S-A-N stands for?

8 A No idea.

9 Q Okay. So in this particular instance,  
10 CitiMortgage was NTC's client?

11 A Uh-huh.

12 Q And they contacted you to prepare an Assignment  
13 of Mortgage; is that correct?

14 A They contacted us to prepare a group of  
15 Assignments. It wasn't just one.

16 Q How many is -- let me start all over with that  
17 one.

18 In this instance, how many did they ask you -- or  
19 did they send over at one time?

20 A I don't have that number.

21 Q Would it be -- and I'm not asking you to guess,  
22 but if you do have a ballpark, would it have been dozens or  
23 hundreds?

24 A Hundreds to thousands but I don't know in this  
25 particular case how many.

17

1 Q So -- I'm sorry.

2 A I was going to say we've done over a hundred  
3 thousand Assignments so. . .

4 Q So anywhere from a hundred -- from hundreds to a  
5 hundred thousand, they would send a request?

6 A They send them in groupings.

7 Q And when you say "they send them in groupings,"  
8 that's requests for Assignments of Mortgages --

9 A Yes.

10 Q -- in groupings? Okay.

11 Right underneath the portion we just read,  
12 there's a -- a CMI L number.

13 A Uh-huh.

14 Q Do you -- can you explain that number?

15 A That's a CitiMortgage loan number, and the one  
16 underneath is the assignee loan number.

17 Q And in this instance, do you know who the  
18 assignee is?

19 A Bayview.

20 Q Just under that, on the Corey Assignment that  
21 we've marked as Exhibit 2 --

22 A Uh-huh.

23 Q -- there's an effective date. How -- how is the  
24 effective date selected?

25 A It's given to us by the client.

18

1 Q So it's given to you by CitiMortgage?

2 A Uh-huh.

3 Q Is it given to you -- is -- is every Assignment  
4 in that batch given the same effective date?

5 A Usually. It's usually because it's a transfer of  
6 a grouping of loans from one entity to another.

7 Q So that is -- is that also the date that the  
8 batch is transferred to Nationwide?

9 A No. We could prepare Assignments in advance of a  
10 transfer date so that they're ready to be sent to record on  
11 the transfer date is usually how it's done.

12 Q In anticipation of a transfer?

13 A No. Usually banks know that they're buying and  
14 selling groups of loans to each other --

15 Q Uh-huh.

16 A -- and so based on whatever agreement they have  
17 and what actions have to transpire previous to that, they

18 could tell us that, say, "x" loans, these 100 loans are  
19 going to change hands on this date. They'll give us the  
20 information so they can be ready and prepared to go out the  
21 door on that date to go to recording.

22 Q And just below that, we have the title,  
23 "Assignment of Mortgage: For good and valuable  
24 consideration."

25 Are you -- do you have the information as to the

19

1 consideration paid for this particular mortgage?

2 A Nope.

3 Q Do you know who does have that information?

4 A I would assume CitiMortgage and Bayview.

5 Q But you're not certain?

6 A No.

7 Q And then we have "CitiMortgage as successor in  
8 interest by merger to CitiFinancial Mortgage Company, Inc.,"  
9 whose address is 1000 Technology Drive in O'Fallon,  
10 Missouri --

11 A Uh-huh.

12 Q -- assigning a mortgage together with a note to  
13 Bayview Loan Services; is that correct?

14 A Yes.

15 Q Is this typically how Assignments of -- or  
16 transfer of notes occur through Assignment of Mortgage?

17 MS. PARSONS: Objection. You still have to  
18 answer.

19 THE WITNESS: I still have to answer?

20 MS. PARSONS: If you know the answer.

21 THE WITNESS: Yeah. I'm sorry. Sorry.

22 MS. PARSONS: I just do it for the record, just  
23 so you know.

24 THE WITNESS: Okay. Got it.

25 A To answer your question, on this particular case,

20

1 I don't know what occurred on it because I was not part of  
2 the -- the sale or of the agreement between Bayview and  
3 Citi. We were hired specifically to do Assignments.

4 Normally, this is an action recording at the  
5 county to indicate a sale has taken place or a transfer of  
6 loans has taken place from one entity to another.

7 Q (By Ms. Drysdale) So I'm not sure that -- that  
8 answered the question that I was asking.

9 This document is apparently assigning a note?

10 A Yes.

11 Q Is that correct?

12 A Yes.

13 Q And is it your understanding that that's  
14 generally how notes are transferred through Assignments?

15 A I'm trying to figure out how to answer this  
16 question. It is my understanding that notes are transferred  
17 through a sale agreement between mortgage entities. They  
18 record Assignments to put on the record who the current  
19 beneficiary is for that note and loan, that mortgage.  
20 The -- the Assignment itself is not the, to my  
21 understanding, the actual sale of the loan. Does that make  
22 sense?

23 Q Yes, ma'am.

24 A Okay. So that's why I'm saying this is to  
25 indicate that that event occurred and to record it at the

21

1 county recorder's office as having occurred.

2 Q And you said that you were not part of these or  
3 privy to the details of the sale from CitiMortgage to  
4 Bayview; is that correct?

5 A Correct.

6 Q That you were just asked to prepare a document?

7 A Prepare Assignments, yes.

8 Q Okay. Further down, still on the left hand side,  
9 we see the signature of Bryan Bly as vice president?

10 A Yes.

11 Q And is Bryan Bly someone who you supervise?

12 A Directly, no.

13 Q But he is an employee of Nationwide Title  
14 Clearing?

15 A Correct.

16 Q Who is his supervisor?

17 A Elsa McKinnon.

18 Q Could you spell that, please?

19 A E-L-S-A M-C-K-I-N-N-O-N.

20 Q When you and I spoke earlier, you indicated  
21 that -- that you might be a better person to provide  
22 information about this Assignment than Mr. Bly; do you  
23 recall that?

24 A Yes.

25 Q And -- and why did you think that you rather than



22

1 his supervisor could be explain what --

2 A Because the questions that you were asking in  
3 your affidavit did not just have to do with him signing the  
4 direct document. You -- the questions pertained also to our  
5 overall procedure and our connection with CitiMortgage,  
6 which are questions that he can't answer.

7 Q So then let's talk a little about what Mr. Bly --  
8 what he actually does in executing an Assignment of  
9 Mortgage. Can you go through that process with me?

10 A Yeah. He is what we refer to as a signer. He is  
11 somebody at Nationwide who is designated to execute  
12 documents.

13 Q So just can you give me a general idea of what  
14 his -- his day-to-day activities would be?

15 A He signs and notarizes documents.

16 Q So when he comes in in the morning, he sat -- he  
17 sits at his desk, and that's pretty much all he does all  
18 day?

19 A Yes.

20 Q Is sign and notarize documents?

21 A Yes.

22 Q Assignments of Mortgage?

23 A Assignments of Mortgage, Lien Releases.

24 Q Does he actually research any of the information  
25 contained in the Assignment of Mortgage?

23

1 A No.

2 Q No?

3 A No.

4 Q About how many documents, including Assignments  
5 of Mortgage, would he sign in the average day?

6 A A couple thousand.

7 Q And -- and this -- is he permanently employed?  
8 Well, let me ask that question in a different way.

9 Is his -- his employer -- his present employer  
10 and business address is Nationwide Title at 2100 Alt. 19  
11 North; is that correct?

12 A Yeah. He's presently a full-time employee with  
13 Nationwide Title Clearing.

14 Q Okay. In the assign -- the Corey Assignment of  
15 Mortgage, he lists his address as 10000 [sic] Technology  
16 Drive, O'Fallon, Missouri.

17 Why is that particular address used?

18 A That has to do with the question on how Bryan Bly  
19 can sign as a vice president as well.

20 Q Okay.

21 A So the answer to that question has to do with a  
22 corporate resolution.

23 Q Do you have that document with you?

24 A Yes.

25 Q May I take a look at that?

24

1 A Uh-huh. I only brought one copy of this, so if  
2 we need more, you'll have to let me know.

3 THE WITNESS: Do we need to get another copy for  
4 you before we do this?

5 MS. PARSONS: Probably.

6 THE WITNESS: Can we pause for one second?

7 (A brief recess was taken at 11:54 a.m.)

8 THE WITNESS: This is a copy of the Corporate  
9 Resolution signed by the board of directors of  
10 CitiMortgage, and it appoints Nationwide Title  
11 Clearing, "are appointed as assistant secretaries and  
12 vice presidents of the corporation."

13 MS. DRYSDALE: Okay. So we will mark this as --  
14 this Joint Consent of the Executive Committee as  
15 Defendant's 3.

16 (Defendant's Exhibit Number 3 was marked for  
17 identification.)

18 Q (By Ms. Drysdale) Do you still have a copy in  
19 front of you?

20 A I do, yes.

21 Q Okay. Do we have or is there located at  
22 Nationwide Title Clearing the minutes of the meeting of the  
23 executive committee of the board of directors when this  
24 consent was created?

25 A No, it's not required.

25

1 Q It's not required?

2 A No.

3 Q And is that -- that's what your -- your legal  
4 department --

5 A Correct.

6 Q Okay. Do you know how they decided to name these  
7 employees listed on the consent as assistant secretaries and  
8 vice presidents of the corporation?

9 A Generally, we -- we provide them a list of the  
10 employees that we'd like them to list.

11 Q Do you know how the -- they're -- because they're  
12 basically being designated as officers of the corporation.  
13 Do you know why that particular designation was chosen?

14 A You -- you have to name them as officers in order  
15 to sign documents in certain counties. They're only  
16 designated as officers in regards to the actual signing of  
17 the documents. That's -- that's their limitation. If you  
18 read the entire document, that's what it limits them to.

19 Q So they are -- they are nominated in these  
20 positions for the -- I guess, for the sole purpose of  
21 processing releases and Assignments; is that correct?

22 A Correct.

23 Q Do you know if this -- I guess it's the "Further  
24 Resolved" paragraph, relates to the public trustee of the  
25 city and county of Denver, Colorado? Do you know what

26

1 that --

2 A Yeah. For a period of time, Colorado required  
3 that for people signing documents. They no longer require  
4 it. It's actually been removed from current corporate  
5 resolutions, which is something that particular county  
6 required be included on our corporate resolution for a time  
7 period.

8 Q Do you have a copy of the indemnity agreement?

9 A No. I did not bring that with me.

10 Q But that's something that is in possession of  
11 Nationwide?

12 A Yes.

13 Q And so when Mr. Bly is executing the couple  
14 thousand of Assignments a day, that is the extent of his --  
15 that's the extent of his duties as vice president?

16 A Uh-huh -- yes, sorry, or assistant secretary. It  
17 just depends on what's required at the county. He could be  
18 listed as either or.

19 Q So does Nationwide have a chart of all the  
20 counties in Florida to know whether or not Mr. Bly is  
21 supposed to be a vice president or assistant secretary?

22 A We have a list of all the counties in the entire  
23 United States that tells us that.

24 Q So Mr. Bly executes Assignments of Mortgage to be  
25 recorded all over the United States?

27

1 A And Lien Releases.

2 Q And Lien Releases.

3 Does he hold that position as vice president for  
4 any other companies other than CitiMortgage?

5 A Yes.

6 Q What other companies?

7 A There are many, and I don't know if I can just  
8 release all of the names of them.

9 Q Okay.

10 A But for all of our clients where we sign, he is  
11 listed as one of the signers.

12 Q Previously you said that the consent of the  
13 executive committee was the reason for the -- the address  
14 being listed as a 1000 Technology Drive.



15                    Could you expound upon that?

16                    A     Yeah. He's acting as the capacity as the vice  
17                    president for that company, and that is the address of that  
18                    company.

19                    Q     So he's not physically located in Missouri? He  
20                    just --

21                    A     No. He's physically located in Florida.

22                    Q     He just lists that as his address for purposes of  
23                    this Assignment of Mortgage?

24                    A     Correct.

25                    Q     And who is Christopher Jones?

28

1                    A     Christopher Jones is an employee of Nationwide  
2                    Title Clearing.

3                    Q     And what are his day-to-day duties?

4                    A     He also works in the processing area. One of the  
5                    duties he has is he is one of our signers and one of our  
6                    notaries.

7                    Q     Does Mr. Bly also work in the processing  
8                    department?

9                    A     That's the department, yeah.

10                    Q     Is Mr. Bly also a notary?

11                    A     Yes.

12                    Q     Down at the bottom of the Corey Assignment it  
13                    says that the document was prepared by Jessica Fretwell?

14                    A     Yes.

15                    Q     Do you know Ms. Fretwell?

16                    A     Yes.

17                    Q     And is she also an employee of Nationwide?



18 A Yes, she is.  
19 Q And what is her job description?  
20 A She works in our quality control division.  
21 Q What are her day-to-day responsibilities?  
22 A How to do with the establishment of the forms and  
23 the county requirements.  
24 Q When you say "the establishment of the forms,"  
25 what do you mean by that?

29

1 A This form is -- each form that we have is set up  
2 for the county. They have margin requirements, what has to  
3 be on it, like how many witnesses, who has to sign it, that  
4 sort of thing. So she established the actual form that the  
5 information that our enterers key in, gets fed into.  
6 Q Did she prepare this document? And I'm referring  
7 to the Corey Assignment.  
8 A She prepared the form, and it printed out with  
9 the information with -- from our data enterers.  
10 Q So who generated the Corey Assignment, the actual  
11 physical piece of paper?  
12 A It came out of our printing area.  
13 Q Did -- was a person responsible for that, or is  
14 that something that's automated?  
15 A It's automated.  
16 Q And what is the name of the automated system that  
17 creates the actual Assignments?  
18 A Planat Press.  
19 Q Can you spell that for me?  
20 A P-L-A-N-A-T P-R-E-S-S.

21 Q And where does Planat Press get the information  
22 needed to create the documents?

23 A The form is created in Planat Press as I  
24 described by Jessica Fretwell in the quality control area.  
25 They create the form that the document -- the information is

30

1 fed in to, and our data enterers will enter the information.  
2 It gets quality control checked, and once it's verified, it  
3 then gets printed.

4 Q So a human enters the specifics, the dates and  
5 the names of the entities?

6 A Yeah.

7 Q And the name of the signer?

8 A Yeah. And in this particular case, that document  
9 did not get printed off as I explained earlier. That's an  
10 electronic recording.

11 Q So this -- the document, the Corey Assignment,  
12 was never a physical piece of paper that was manually  
13 signed; is that correct?

14 A That is correct.

15 Q Okay. So Mr. Bly didn't actually sign the Corey  
16 Assignment; is that correct?

17 A Well, he didn't physically sign it, but he --  
18 that meets with the standards for electronic document  
19 recording.

20 Q Okay. Are you referring to a specific state or  
21 federal law?

22 A This -- no. Specific counties across the nation  
23 have started setting it up, so part of like going more green